



Mr David Cliff  
The Planning Inspector  
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Date: 20 May 2025

Please ask for:

Tel:

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Dear Mr Cliff, and the Examining Authority ('ExA') Panel

**Application by Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited for an Order Granting Development Consent for the Morgan and Morecambe Offshore Windfarm Transmission Infrastructure (the 'Application')**

**Submission by Blackpool Borough Council pursuant to Deadline 1 ('D1') of the Examination of the Application.**

1. This letter is written on behalf of Blackpool Borough Council (the 'Council') in its capacity as a unitary local authority, (Host and Neighbouring Authority), and in its capacity as landowner of various land holdings located within the proposed Development Consent Order ('DCO') order limits and owner of the Blackpool Airport companies.
2. Please find below a list of documents which form the Council submission at Deadline 1 of the Examination:
  - A written summary of the Council's oral submissions at Issues Specific Hearing 1 ('ISH1') and Compulsory Acquisition Hearing 1 ('CAH1');
  - Blackpool Borough Council Local Impact Report; and
  - A Written Representation by the Council in its capacity as landowner.
3. This letter also comprises the Councils responses to the Action Points arising from ISH 1 and CAH 1 as set out in the Rule 8 Letter dated 8 May 2025. The matters addressed in this letter include:
  - 3.1. Notice of intent to attend further compulsory acquisition hearings;
  - 3.2. Notice of intent to attend the accompanied site inspection;
  - 3.3. Suggested locations for site inspections; and
  - 3.4. Comments on Applicants' engagement with Blackpool Borough Council regarding the use of Starr Gate.

## **Notice of intent to attend further compulsory acquisition hearings**

4. The Council confirms that it will attend any further compulsory acquisition hearings. The Council is continuing to engage with the Applicants in its capacity as an affected landowner, and host and neighbouring authority. At this stage the Council is not content that the tests of necessity, proportionality or certainty have been met in respect of rights sought. The Council anticipates to be in a position to update the ExA at Deadline 2 following discussions with the Applicants.

## **Site Inspection**

5. The Council requests that Mr Rob Green, Head of the Blackpool Enterprise Zone, attend the Examining Authority's accompanied site inspection from Starr Gate slipway, the proposed northern access through Blackpool Airport, Blackpool Airport and Lytham St Annes beach.
6. The Council request that the accompanied site inspection include the entire proposed northern accessway, across the airport main taxiway, to the proposed compound locations on the south side of Blackpool Airport. The Council considers the inclusion of these areas important to understand the current usage of the proposed northern access route and constraints of proposed construction and maintenance traffic using a route through an operational airport. An escort from the Airport's operational team will be required, and representatives may be limited, due to safety, airport operations and resourcing.

## **ExA action point: Comments on Applicants' engagement with the Council regarding the use of Starr Gate**

7. Engagement with the Council regarding the use of Starr Gate beach access is at early stages. The Council welcome the preliminary meeting held on 8 May 2025 in respect of the Council's responsibilities as host and neighbouring authority and local highways authority only, not landowner.
8. A number of rights requested in the dDCO are considered to be wider than required for the Applicants to undertake the Development. During ISH1 the Applicant advised that the Starr Gate accessway is be used for occasional light craft only. The Council's key concerns regarding the impacts of the Development on Starr Gate are (in summary):
  - 8.1. Closure of Starr Gate for any period will impact access for passive and active recreation and tourism (including events and festivals), emergency services and commercial users;

- 8.2. closure of access (from Starr Gate) to the Tram Depot or any interruption to power supply to the tramway from the adjacent sub-station would severely disrupt vital tourist and resident public transport along the Coast;
  - 8.3. protection of critical infrastructure which comes ashore via Starr Gate to the Enterprise Zone, and protection of the Starr Gate slipway itself; and
  - 8.4. traffic impacts on Clifton Road and the Promenade.
9. The Council has communicated to the Applicants at the meeting of 8 May 2025 that these concerns could be allayed by:
- 9.1. Certainty as to the proposed use of Starr Gate during the construction and maintenance phases of the proposed development:
  - 9.2. Commitment the Starr Gate accessway is not completely closed at any time:
  - 9.3. Protection of the critical and vulnerable infrastructure located within Starr Gate and under the beach. The current protective provisions are considered to be insufficient and this infrastructure is vital to the Blackpool Enterprise Zone and the Silicon Sands project: and
  - 9.4. Consideration of traffic management measures to replace the rights currently sought to be acquired under the dDCO, which would meet the tests of necessity and proportionality, and enable a collaborative working relationship which the Council.

If you require any further information, please do not hesitate to be in contact.

Yours sincerely



Legal Director

**DWF Law LLP**